



THE CITY OF NEW YORK
LAW DEPARTMENT
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Hon. Sylvia O. Hinds-Radix
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January 11, 2024

BY ECF

Honorable Arun Subramanian
United States District Court
Southern District of New York
New York, New York 10007

Re: Taveras v. New York City, 20 CV 01200 (AS)

Dear Judge Subramanian:

I am an attorney in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and counsel for Defendant in the above-referenced action. I write in accordance with section 3(E) of Your Honor's Individual Practices to request an extension of time for Defendant to respond to Plaintiff's motion for reasonable attorneys' fees and costs. Defendant's opposition is currently due on January 15, 2024.

The parties have worked towards settling the above-described motion. Defendant requests a four-week extension of its time to respond to Plaintiff's motion to try to continue such settlement efforts and to simultaneously draft opposition to Defendant's motion should further settlement efforts prove unsuccessful. This is the second request for such an extension. Defendant's previous request was granted extending Defendant's time to respond to Plaintiff's motion from December 4, 2023 to January 15, 2024. Plaintiff's counsel has consented to a two-week extension, however, as set forth above, Defendant is requesting a four-week extension so that its opposition will be due February 15, 2024.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/

Kerri A. Devine